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Illinois Bell Telephone Company)	
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Application for Review)	98-0252
of Alternative Regulation Plan.)	
)	98-0335
Illinois Bell Telephone Company)	
)	00-0764
Petition to Rebalance Illinois Bell Telephone)	
Company's Carrier Access and Network)	(Cons.)
Access Line Rates.)	
)	
Citizens Utility Board and)	
The People of the State of Illinois)	
-v-)	
Illinois Bell Telephone Company)	
)	
Verified Complaint for a Reduction in Illinois)	
Bell Telephone Company's Rates and Other)	
Relief.)	

INITIAL BRIEF OF
McLEODUSA TELECOMMUNICATIONS SERVICES, INC.

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I. SUMMARY OF McLEODUSA'S POSITION

This is the initial brief of McLeodUSA Telecommunications Services, Inc. ("McLeodUSA")
McLeodUSA is addressing only topic IV.B, "Service Quality - Going Forward - Existing and Proposed Measures and Benchmarks" in the Hearing Examiners' corrected outline for briefs.

This proceeding was initiated for the purpose of assessing whether the Commission should continue some form of alternative regulation for Ameritech Illinois ("Ameritech"). McLeodUSA's sole concern in this proceeding relates to the service quality measures that Ameritech is required to meet as a component of its alternative regulation plan.¹ As a competitive local exchange company ("CLEC") which is dependant on Ameritech for substantially all of the facilities and services it uses to provide services to retail customers, McLeodUSA has a strong interest in the quality of service that Ameritech provides, and in whether Ameritech meets the performance measurement standards that this Commission has established. Initially, McLeodUSA did not intervene in this proceeding, as it expected the issue of the quality of Ameritech's services provided to CLECs to be addressed directly in other proceedings initiated specifically for that purpose.² However, after the Government and Consumer Intervenors ("GCI"), through the Direct Testimony

¹McLeodUSA is one of the nation's largest competitive local exchange carriers. McLeodUSA is authorized to provide facilities-based and resold exchange and interexchange telecommunications services in all Ameritech exchanges. McLeodUSA offers service in the Chicago metropolitan area and 12 downstate markets using both resold and facilities-based services. About half of McLeodUSA's business customers are served on a facilities basis using unbundled network loops leased from Ameritech in conjunction with McLeodUSA's local switching facilities. The remaining business customers are served via resale of Centrex service and some plain old telephone service ("POTS"). Most of McLeodUSA's residential customers in Illinois are served via resale of Centrex. A small number of McLeodUSA's customers are served through McLeodUSA's own local loops and switching facilities. (McLeodUSA Ex. 1.0, pp. 3-5)

²Development of a performance measurement and remedies plan, pursuant to Condition 30 of the Commission's order approving the SBC-Ameritech merger in Docket 98-0555, is currently being addressed in Docket 01-0120, to which McLeodUSA is a party.

of Charlotte F. Terkeurst (GCI Ex. 2.0), raised the issue of Ameritech's service quality, McLeodUSA intervened and presented testimony in order to state its position on this critically important topic.³

The record shows that Ameritech's service quality has declined significantly since its alternative regulation plan was adopted, and that Ameritech's service quality remains inadequate. Ameritech has consistently performed below the level of service quality set by this Commission. The record also shows that Ameritech's inadequate service quality adversely impacts not only its own retail customers, but the retail customers served by CLECs. Ameritech's poor service quality also impairs the ability of CLECs such as McLeodUSA to gain a foothold in the local service market. Ameritech's substandard performance for both its retail and wholesale customer bases has actually given Ameritech a competitive edge.

Despite this record, Ameritech in this proceeding is requesting that the Commission weaken the existing service quality incentive mechanism currently included in Ameritech's alternative regulation plan. The Commission's purpose in implementing these measures was to adequately protect consumers. The measures also serve to foster competition in the marketplace. Rather than weakening the service quality incentive mechanism currently included in the plan, if alternative regulation continues, the Commission should instead introduce tougher measures into the plan in order to improve the quality of Ameritech's provision of telecommunications services in Illinois to an acceptable level and thereafter maintain that level.

GCI witness Ms. Terkeurst has recommended a set of service quality measures for Ameritech which are generally acceptable to McLeodUSA. McLeodUSA has also presented a set of performance measurement standards for Ameritech, and appropriate values for those standards, that

³The GCI are the Attorney General, the Cook County State's Attorney, the Citizens Utility Board, and the City of Chicago.

McLeodUSA has advocated in similar proceedings around the country. (See McLeodUSA. Ex. 1.1) McLeodUSA emphasizes that any set of performance measures which the Commission establishes for Ameritech should incorporate the “parity with a floor” concept: First, the same service quality measures must apply both to Ameritech’s service to its retail customers and to Ameritech’s service to its wholesale customers, the CLECs (“parity”). Second, the minimum acceptable values for each service quality measure must be set at a level that represents adequate service (the “floor”). McLeodUSA is indifferent as to whether the Commission adopts revised performance measurement standards for Ameritech in this proceeding or in a proceeding specifically targeted to that topic, such as Docket 01-0120. However, McLeodUSA emphasizes that the issue of Ameritech’s inadequate retail and wholesale service quality should be addressed promptly by the Commission, in one of the currently available dockets.

II. SERVICE QUALITY-GOING FORWARD

A. Legal Standards

In order to approve a plan, or a modified plan, of alternative regulation for a telecommunications carrier providing noncompetitive telecommunications services, the Commission must find that the plan meets several criteria that are specified in §13-506.1(b) of the Public Utilities Act (220 ILCS 5/13-506.1(b)). These include the criteria that the plan is in the public interest; responds to changes in technology and the structure of the telecommunications industry that are in fact occurring; will maintain the quality and availability of telecommunications services; and will not unduly or unreasonably prejudice or disadvantage any particular customer class, including telecommunications carriers. (Id.)

In addition, under §252(c) of the Telecommunications Act of 1996, Ameritech, as an incumbent local exchange carrier (“ILEC”), has the duty to provide, for the facilities and equipment

of any requesting CLEC, interconnection with the ILEC's network "that is at least equal in quality to that provided by the [ILEC] to itself or to any subsidiary, affiliate, or any other party to which the [ILEC] provides interconnection," and "on rates, terms and conditions that are just, reasonable, and nondiscriminatory." Section 252(c) also requires an ILEC, such as Ameritech, to provide to a requesting CLEC nondiscriminatory access to unbundled network elements at any technically feasible point, on rates, terms and conditions that are just, reasonable and non-discriminatory.

These statutory provisions, as well as the specific requirements attached by the Commission to its approval of the SBC-Ameritech merger in Condition 30 of its order in Docket 98-0555, give the Commission ample authority to impose revised or additional requirements for performance measurement standards in connection with its approval of any modification or extension of Ameritech's alternative regulation plan.

B. Existing and Proposed Measures and Benchmarks

1. Ameritech's Inadequate Service Quality Performance Adversely Affects McLeodUSA and Other CLEC Competitors Trying to Gain a Foothold in the Competitive Local Service Market

Because of Ameritech's monopoly on the services and facilities CLECs need in order to serve their customers in Illinois, McLeodUSA is dependant upon Ameritech for the facilities it needs to provide retail service in Illinois. (McLeodUSA Ex. 1.0, p. 10). If Ameritech provides poor service, McLeodUSA is negatively impacted by its dependence on Ameritech. (*Id.*, p. 11) McLeodUSA's customers are unaware that McLeod/USA must depend upon Ameritech's facilities, service quality performance and standards. (*Id.*) For example, when a CLEC such as McLeodUSA waits weeks for Ameritech to provide a line or restore service, the CLEC's customer waits as well. (*Id.*) McLeodUSA's customers blame McLeodUSA for Ameritech's service failures. (*Id.*) The resulting

loss of customer goodwill can have a devastating impact upon McLeodUSA's customer base and revenues, especially in light of McLeodUSA's entry level position in the retail market. (Id., p. 9).

As GCI witness Ms. Terkeurst testified, Ameritech's service quality performance is chronically substandard, particularly since the commencement of Ameritech's alternative regulation plan:

It is a well-established fact that pure price cap regulation, to which Ameritech Illinois is currently subject, creates an incentive for telecommunications carriers to allow their service quality to decline as they aggressively cut costs and maximize profit. The service quality mechanism within Ameritech Illinois' alternative regulation plan was intended to curtail Ameritech Illinois' incentive to allow service quality to decline, thereby safeguarding service quality and protecting Ameritech Illinois' customers. (GCI Ex. 2.0, p. 3)

It is obvious that the service quality incentive mechanism has failed to achieve its intended goals . . . Almost immediately following adoption of alternative regulation, Ameritech Illinois' service quality took a serious nosedive. (Id., p. 4)

After summarizing data that demonstrates Ameritech's declining and inadequate service quality (id., pp. 4-6; see also id., pp. 8-13), Ms. Terkeurst recommended that "if alternative regulation is continued, the Commission should continue to apply pressure on SBC and Ameritech Illinois to immediately and permanently resolve the extensive service quality problems. (Id., p. 7) A detailed review of Ameritech Illinois' service quality performance should be a critical part of the Commission's evaluation of the terms and conditions of Ameritech Illinois' alternative regulation mechanism, and the service quality incentive mechanism should be strengthened in a number of critical respects." (Id.)

McLeodUSA presented the testimony of Rod Cox, its Senior Manager of Customer Support, on the topics of Ameritech's service quality from the perspective of a CLEC, and of the performance measurement standards that should be adopted for Ameritech. (McLeodUSA Ex. 1.0-1.1). As Senior Manager of Customer Support, Mr. Cox is in charge of determining what McLeodUSA, as a

CLEC, needs from its wholesale suppliers, the ILECs, in order to get into business and provide quality service to McLeodUSA's customers. (McLeodUSA Ex. 1.0, p. 2).

Mr. Cox testified that Ameritech frequently misses performance benchmarks. Ameritech's service quality was so bad for most of 2000, especially from June through September, that Ameritech effectively lowered everyone's expectations of its ability to provide service. (McLeodUSA Ex. 1.0, p. 6). Since October, Ameritech has attempted to address some of its worst service problems, but as Mr. Cox explained, has only succeeded in improving its service quality from "0" to "2" on a scale of "10." (Id.) Such lackluster improvement should not relieve Ameritech of its service quality obligations, especially in light of Ameritech's long history of failing to consistently perform satisfactorily. Ameritech still has many service quality deficiencies, and customers -- including wholesale customers such as McLeodUSA -- continue to experience unacceptable levels of service quality. (McLeodUSA Ex. 1.0, p.9). As a result, McLeodUSA continues to be negatively impacted by the less than adequate quality of service provided by Ameritech. (Id.)

Improving Ameritech's retail service quality is necessary for the development of competition in the telecommunications marketplace in Illinois. (McLeodUSA Ex. 1.0, pp. 7-8). Ameritech has consistently advocated that it only has to provide service to wholesale customers that is equal to the service provided to retail customers. (Id., p. 8). The problem with Ameritech's position, as evidenced by Ms. Terkeurst's testimony, is that Ameritech's retail service quality is so inadequate that it gives Ameritech a competitive advantage. (Id.) As Mr. Cox of McLeodUSA explained, poor wholesale service, even at parity with Ameritech's retail performance, can harm a CLEC in at least four ways:

First, it often delays the CLEC's ability to recover its costs because the CLEC cannot bill a customer for services it does not deliver while waiting for Ameritech to install or repair its lines. Second, it imposes additional personnel costs on the CLEC. These

costs include the staffing needed to deal with angry customers and the staffing needed to work through the ILEC escalation process to resolve the service problem. Third, it exposes the CLEC to potential liability for harm to the CLEC's customer. This can pose a significant financial hardship to CLECs such as McLeodUSA who are already incurring large capital costs associated with competitive entry. Finally, and most disturbing, it can seriously damage the CLEC's reputation. For an incumbent monopoly with nearly all the "last mile" facilities and over 95% market share, bad service can lead to bad press. For a new competitor trying to establish itself in the market and begin recovering costs associated with heavy capital investments, poor service can thwart the CLEC's ability to gain a foothold in local markets. A CLEC, struggling against the bottom line to carve out a niche in Ameritech's monopoly market, simply cannot long endure persistently poor service from its sole wholesale supplier. (McLeodUSA Ex. 1.0, pp. 8-9)

In the long run, poor service quality will hurt Ameritech and advantage McLeodUSA and other CLECs. (*Id.*, pp. 8-9) Today, however, since Ameritech serves most of the existing customer base in Illinois, Ameritech's inability to efficiently provision services to customers negatively impacts new entrants more than it hurts Ameritech. (*Id.*, p. 9) The effects of Ameritech's poor service are most apparent when a customer must make some change to its service. (*Id.*) This affects only a fraction of Ameritech's existing customer base, but it affects all customers switching to a CLEC. (*Id.*)

2. In Imposing More Comprehensive Service Quality Standards on Ameritech, the Commission Should Adopt the "Parity with the Floor" Concept.

McLeodUSA urges the Commission to adopt the concept of "parity with a floor" in establishing standards of service quality that Ameritech should be required to meet for the provision of services and facilities to both its retail and its wholesale customers. (McLeodUSA Ex. 1.0, p. 10) "Parity with a floor" refers to two things. . First, it means that Ameritech should provide wholesale service to its competitors, such as McLeodUSA, at a quality level no worse than the level Ameritech provides to its retail customers -- i.e. "parity." (*Id.*) Second, it means that Ameritech must meet or exceed an objective standard of quality for all of its customers, both retail and wholesale -- i.e. the

“floor.” The “floor” is the measure of service quality below which Ameritech’s services must not be allowed to fall. (*Id.*)

Both “parity” and a “floor” are important to maintenance of a performance measurement program that will promote the development of competition and benefit customers. McLeodUSA, like other CLECs, is dependent on Ameritech – its primary competition -- for the facilities it needs to provide service in Illinois. (*Id.*) This creates a situation that is ripe for anticompetitive discrimination by Ameritech. (*Id.*) In light of this situation, parity measures provide critical information that can reveal whether an ILEC is favoring itself over competitors. Parity standards, coupled with strong remedies, discourage the kind of anticompetitive discrimination that the ILEC might otherwise engage in. (*Id.* pp. 10-11)

Minimum quality standards -- the “floor” -- are equally important because parity at poor performance is still poor performance. (*Id.*, p. 11) Poor performance by Ameritech in providing service to a CLEC harms both the CLEC and the CLEC’s customers. (*Id.*) Ameritech’s poor service not only harms the CLEC’s customers, it also damages the CLEC’s ability to establish itself in the marketplace. (*Id.*)

3. McLeodUSA Supports GCI’s Proposed Additional Performance Measurement Requirements, with Minor Modifications.

Ameritech’s poor service quality has hindered McLeodUSA in competing for end users. (McLeodUSA Ex. 1.0, p. 5). The record demonstrates that there is a need to apply more comprehensive service quality standards to Ameritech in order to more accurately measure its service quality. Such standards, such as those proposed by Ms. Terkeurst in this proceeding, are necessary in order to gauge Ameritech’s progress in addressing its poor service quality performance. (*Id.*, p. 7). Ms. Terkeurst’s proposed service quality measurements are fairly consistent with those that

McLeodUSA has proposed in other proceedings on this issue. (Id., p. 12) McLeodUSA has advocated that the following 17 measures be adopted to implement the “parity with a floor concept”; these measures represent areas of high customer impact, and are business critical as well:

- PM 27 -- Mean Installation Interval
- PM 28 -- Percent Installations Completed within “X” days
- PM 29 -- Percent Ameritech Caused Missed Due Dates
- PM 35 -- Percent of Trouble Reports within 30 days of Installation
- PM 38 -- Percent Missed Repair Commitments
- PM 39 -- Receipt to Clear Duration
- PM 40 -- Percent Out of Service Intervals < 24 hours
- PM 41 -- Percent Repeat Trouble Reports -- POTS
- PM 55 -- Average Installation Interval
- PM 55.1 -- Average Installation Interval -- DSL
- PM 56 -- Percent Installations Completed within “X” Days
- PM 58 -- Percent Ameritech Caused Missed Due Dates
- PM 59 -- Percent Of Trouble Reports within 30 days of Installation
- PM 67 -- Mean Time to Restore
- PM 68 -- Percent Out of Service < 24 hours
- PM 69 -- Percent Repeat Reports
- PM 117 – Percent NXXs Loaded and Tested Prior to Effective Date (McLeodUSA Ex. 1.1, p. 1)⁴

⁴McLeodUSA Ex. 1.1, pp. 2-3, set forth the proposed “floor” for each of the 17 measures, and the source of each “floor” value.

McLeodUSA believes these are key service quality measurements that Ameritech should be required to maintain at the “floor” values shown on McLeodUSA Exhibit 1.1. (McLeodUSA Ex. 1.0, p. 12) Accordingly, McLeodUSA believes that the additional performance measurement requirements Ms. Terkeurst recommends should be imposed on Ameritech, in conjunction with meaningful remedies for inadequate performance. (Id. p. 5)

There are a few differences between the list of service quality standards Ms. Terkeurst proposes and those that McLeodUSA has advocated. First, many of the service quality standards Ms. Terkeurst proposes are limited to POTS. (McLeodUSA Ex. 1.0, p. 12) However, Ms. Terkeurst’s definition of POTS is broad enough to encompass Centrex service, since it is comprised in part of basic network access lines and the ability to make and receive calls. (GCI Ex. 2.0, p. 5, n. 2). As noted earlier in this brief, McLeodUSA is a reseller of Centrex service to residential and small and medium business customers in some Illinois markets. (McLeodUSA Ex. 1.0, p. 7). Once McLeodUSA has established Centrex service (the common block) in a given market, Centrex resale becomes very much like POTS resale. (Id.) The Commission should consider Centrex a POTS service for purposes of the service quality standards proposed by Ms. Terkeurst.⁵ (Id.)

Second, McLeodUSA’s list of service quality measures takes some of the proposed service quality measures set forth in Ms. Terkeurst’s Table 2 of her Exhibit A down to the next level of detail.

⁵McLeodUSA agrees with Ms. Terkeurst that Ameritech should not be permitted to disguise poor service quality performance related to POTS by intermixing those statistics with statistics on Ameritech’s performance related to installing vertical features. (McLeodUSA Ex. 1.0, p. 7) As explained in Ms. Terkeurst’s testimony, the installation of vertical features is done with minimal time and effort. (GCI Ex. 2.0, at p. 24). Commingling the data for installation of vertical features allows Ameritech to mask its actual POTS installation intervals to its benefit. This is inconsistent with the practice of other carriers, and inconsistent with the Commission’s intent in implementing this standard. (Id.)

(McLeodUSA Ex. 1.0, p. 12)) For example, Ms. Terkeurst has one criteria, POTS Mean Time to Repair, that McLeodUSA has broken down into two separate measures. (Id.) One of these performance measures relates to repair of Out of Service Troubles, while the other performance measure relates to non-Out of Service measures. (Id.) This separation would allow the Commission to monitor separately Ameritech's compliance with Out of Service performance requirements and its compliance with non-Out of Service performance requirements.

Finally, Ms. Terkeurst's proposed standard of 10% repeat trouble reports is significantly more lenient than what McLeodUSA recommends to provide quality service to its end users. (McLeodUSA Ex. 1.0, p. 13). Having only one out of every ten troubles reported consisting of a repeat trouble for the same service problem for the same McLeodUSA customer is not providing adequate service. (Id.) This performance measurement standard needs to be much lower than 10% – McLeodUSA has advocated a “floor” of less than or equal to 1%. (McLeodUSA Ex. 1.1, pp. 2-3)

As noted earlier in this brief, McLeodUSA is indifferent as to whether performance measurement standards for Ameritech such as those recommended by Ms. Terkeurst (or those presented on McLeodUSA Ex. 1.1) are adopted by the Commission in this docket or in another case that is specifically focused on this topic, such as the Condition 30 case (Docket 01-0120). However, it is critical to the continued development of the competitive local service market that the Commission adopt such standards in one of the available dockets, very soon.


III. CONCLUSION

For the reasons set forth herein, the Commission should adopt a revised set of performance measurement standards for Ameritech such as those proposed by GCI witness Ms. Terkeurst, or those shown on McLeodUSA Ex. 1.1, either (i) as a condition to continuation of Ameritech's alternative

regulation plan, or (ii) in the proceeding relating to Condition 30 of the order approving the SBC-Ameritech merger, Docket 01-0120, or another docket that is focused on this specific topic.

Respectfully submitted,

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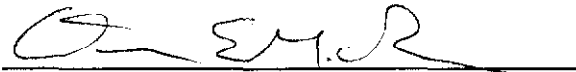
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CERTIFICATE OF SERVICE

I, Owen E. MacBride, certify that on the 22nd day of March, 2001, I served a copy of the Initial Brief of McLeodUSA Telecommunications Services, Inc. by first class mail from Chicago, Illinois, to the individuals on the service list attached.

A handwritten signature in black ink, appearing to read "Owen E. MacBride", written over a horizontal line.

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